

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

UNITED STATES, *et al.*,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

1:23cv00108 (LMB/JFA)

**MOTION OF NONPARTIES BLOOMBERG L.P.,
THE NEW YORK TIMES COMPANY, THE WASHINGTON POST,
PORTFOLIO MEDIA INC., AND MLEX US INC.
TO MODIFY/CLARIFY PROCEDURES
REGARDING ACCESS TO TRIAL AND DOCUMENTS**

Nonparties Bloomberg L.P., The New York Times Company, The Washington Post, Portfolio Media Inc., and MLex US Inc. move pursuant to the right of access under the First Amendment of the U.S. Constitution and Virginia common law for modification and/or clarification of certain procedures regarding access to upcoming trial proceedings and documents in the above-captioned case. The grounds for this motion are set forth in the Memorandum of Points and Authorities filed concurrently herewith.

Date: August 2, 2024

Respectfully submitted,

/s/Matthew A. Leish

Matthew A. Leish (admission *pro hac*
vice pending)

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Post, Portfolio Media Inc., and MLex US
Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of August, 2024, a copy of the foregoing was filed via the Court's CM/ECF electronic filing system, which will serve all counsel of record:

Laurin H. Mills

Laurin H. Mills